

Remarks

Applicants respectfully request reconsideration of this application. At the time the Examiner mailed the Office Action, claims 1-17 and 19-31 were pending. Applicants thank the Examiner for allowing claim 31.

By way of the present response the Applicant has amended claims 1-4, 8-9, 12-13, 19-20, 22-23, 26-27, and 29. No claims have been added. No claims have been canceled. As such, claims 1-17 and 19-31 are now pending. The Applicants respectfully request reconsideration of the present application and allowance of all claims now presented.

Rejections Under 35 U.S.C. § 102

Claims 1-17 and 19-30 were rejected under 35 U.S.C. 102(e) as being anticipated by *Copperman et al.*, U.S. Patent No. 6,711,585 (“*Copperman*”). Applicant respectfully traverses.

Applicants respectfully submit that the present claims are patentable over *Copperman*. Independent claims 1, 19, and 26, as amended, each include at least one limitation not disclosed or suggested in *Copperman*. Therefore, independent claims 1, 19, and 26 are not anticipated and are patentable over *Copperman*.

For example, independent claim 1 recites the limitation: “analyzing the knowledge profiles to determine a knowledge neighbor, wherein the knowledge neighbor is a concept that at least a subset of the knowledge profiles have in common and that differs from the root concept.”

Examiner suggests that the nodes 1220 and 1230 in Figure 15 of *Copperman* are knowledge neighbors, citing *Copperman*’s use of the term “neighbor” to describe those nodes.

Applicants respectfully submit that *Copperman*'s use of the term "neighbor" is not equivalent to the "knowledge neighbor" of claim 1.

In *Copperman*, the term "neighbor" is used simply to identify a node that is near another node on a map that has already been generated. *Copperman* states, "a node with two or more immediate neighbors that are query taxonomy tags is marked. In FIG. 15, nodes 1210, 1220, 1230, 1240 and 1250 are marked nodes." (*Copperman*, col. 35, lines 32-37). Therefore, *Copperman* uses the term "neighbor" simply to identify nodes on an existing map. This is not equivalent to a "knowledge neighbor" of claim 1.

In claim 1, a "knowledge neighbor is a concept that at least a subset of the knowledge profiles have in common and that differs from the root concept." As claim 1 clarifies, the knowledge neighbor is used to create a map: "using the root concept, the knowledge neighbor and the affinity to create a map." The map of claim 1 does not exist prior to determination of the knowledge neighbor.

Even a node in *Copperman* that expresses a concept (such as "audience" node 300 in Figure 11 of *Copperman*, cited by the Examiner on page 3 of the Office Action, dated April 5, 2005), cannot be equated to a knowledge neighbor of claim 1. As *Copperman* explains, "taxonomy 30 consists of a root node 300, a plurality of concept nodes 310 coupled together by a plurality of edges 320. Each node (300 and 310) in a taxonomy expresses a concept, or a classification to which content and resources can be assigned." (*Copperman*, col. 9, lines 2-6). In other words, "audience" node 300 is a root concept, in a taxonomy, to which content and resources are assigned. (See *Copperman*, col. 5, lines 20-26).

In contrast, in claim 1, a knowledge neighbor is a concept that differs from the root concept. In claim 1, knowledge profiles having the root concept in common are identified. By

analyzing the identified knowledge profiles, another concept (the knowledge neighbor) is determined. At least a subset of the identified knowledge profiles have this other concept (the knowledge neighbor) in common, while all of the identified knowledge profiles have the root concept in common. Thus, in claim 1, a knowledge neighbor is a concept that at least a subset of the identified knowledge profiles have in common, but that differs from the root concept.

In contrast, “audience,” which Examiner asserts as being a concept that the nodes in Figure 11 of *Copperman* have in common, is the root concept. Therefore, “audience” cannot be equated to a knowledge neighbor of claim 1. Additionally, none of the other nodes in Figure 11 are “knowledge neighbors” because none of the other nodes are concepts, or equate to concepts, determined by analyzing knowledge profiles having the root concept in common.

Therefore, *Copperman* does not disclose the limitation of “analyzing the knowledge profiles to determine a knowledge neighbor, wherein the knowledge neighbor is a concept that at least a subset of the knowledge profiles have in common and that differs from the root concept.” Therefore, claim 1 is patentable over *Copperman*.

Independent claims 19 and 26 also each include a limitation similar to that of claim 1 discussed above. Therefore, claims 19 and 26 are also patentable over *Copperman*.

Claims 2-17, 20-25 and 27-30 depend, directly or indirectly, from one of the foregoing independent claims. Therefore, claims 2-17, 20-25 and 27-30 are also patentable over *Copperman*. Withdrawal of the rejection is respectfully requested.

Conclusion

Applicants respectfully submit the present application is in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call Jordan Becker at (408) 720-8300.

Pursuant to 37 C.F.R. 1.136(a)(3), Applicants hereby request and authorize the U.S. Patent and Trademark Office to (1) treat any concurrent or future reply that requires a petition for extension of time as incorporating a petition for extension of time for the appropriate length of time and (2) charge all required fees, including extension of time fees and fees under 37 C.F.R. 1.16 and 1.17, to Deposit Account No. 02-2666.

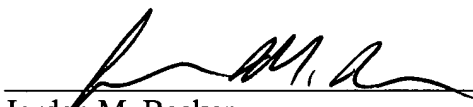
Respectfully submitted,

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